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# DEPARTMENT OF ADMINISTRATIVE SERVICES

## TELECOMMUNICATIONS DIVISION

200 Piedmont Avenue, Suite 1402, West Tower

Atlanta, Georgia 30334-5540

DAVID C. EVANS  
COMMISSIONER

GEORGE A. CHRISTENBERRY, JR.

DEPUTY COMMISSIONER

June 7, 1993

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Ms. Donna Searcy  
Secretary  
Federal Communications Commission  
1919 M Street NW, Room 222  
Washington, D.C. 20554

RE: PR Docket No. 92-235

Dear Ms. Searcy:

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

DEPARTMENT OF ADMINISTRATIVE SERVICES  
TELECOMMUNICATIONS DIVISION

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GEORGE A. CHRISTENBERRY, JR.  
DEPUTY COMMISSIONER

DAVID C. EVANS  
COMMISSIONER

May 18, 1993

92-235

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Ms. Donna Searcy  
Secretary  
Federal Communications Commission  
1919 M Street NW, Room 222  
Washington, D.C. 20554

RE: PR Docket No. 92-235

Dear Ms. Searcy:

As the responsible agency for providing radio communications services for State agencies and frequency coordination service for the majority of the state and local government public safety agencies in the State of Georgia, the Department of Administrative Services, Telecommunications Division commends the Federal Communications Commission for its efforts to more efficiently use spectrum allocated to the private land mobile radio services below 512 Mhz. However, upon review of the proposed new part 88, we have determined that the proposed rules will create significant economic and operational problems for the state and local government agency radio users below 512 MHz.

The proposed rules do not provide a migration path for agencies to make a gradual changeout of equipment. This will require most agencies to completely change all their equipment at the outset before the equipment is fully amortized. Since many of the law enforcement agencies coordinate with federal law enforcement agencies, this will require two radios in the vehicles to communicate with local and federal agencies. Also the proposed methodology for reducing the base station transmitter power will significantly reduce coverage areas, and require agencies to purchase base station equipment, towers, antennas, etc., to reinstate the original coverage, or replace equipment that could not be reduced in power.

The immediate deviation reduction to 3 KHz will result in an effective range reduction of 40% and insufficient audio output power in high noise areas. Also the reduced deviation will cause tone-coded squelch and pager decoder failures. A majority of the law enforcement agencies utilize scanners which will be severely affected by the deviation reduction.

Ms. Donna Searcy  
May 18, 1993  
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The State of Georgia presently has five mutual aid channels in the frequency bands below 512 MHz. The use of these channels has proven to be critical in many situations in public safety operations. The proposed rules do not provide for the continuation of these type of channels. Without the mutual aid channels law enforcement officers, fire fighters and other public safety personnel will find it difficult, if not impossible, to have inter-agency radio communications. This lack of communications will result in life threatening situations for public safety personnel.

Based on the present quantities of radio units, 1050 base stations, 8150 mobiles and 5500 portables, the estimated minimum cost is \$75,000,000 for the State of Georgia to comply with the new rules. This will significantly impact the State budget. The economic conditions at this time for State and local governments are in the recovery stage and the budgets cannot absorb these costs without reductions in other services. Even without the additional costs for replacing radio equipment the budgets are being stretched due to increasing costs in health care, education, infrastructure repairs, and other government services. The economic impact to implement the proposed rules and maintain an equivalent level of radio communications services is not feasible for Georgia state and local government agencies.

As active participants of APCO Project 25, we believe that the results of this project will meet the objectives outlined by the Federal Communications Commission. All participants, State, local and federal government, realize that more efficient use of the spectrum is required to meet the ever increasing radio communications needs, but there must be a migration path that will